

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:21-cv-12110-FDS

DEFENDANT’S UNOPPOSED MOTION TO SEAL/IMPOUND

Defendant Google LLC (“Google”) respectfully requests that this Court impound (seal) portions of Google’s Answer and Affirmative Defenses (ECF No. 53) (“Answer”). Google makes this motion pursuant to Local Rule 7.2, the Order Regarding Discovery Cross-Use in this case (“*Singular IP*”), ECF No. 52 (“Cross-Use Order”), and the Protective Order in *Singular Computing LLC v. Google LLC*, No. 1:19-cv-12551 FDS (D. Mass.) (“*Singular I*”), ECF No. 74-1 (“Protective Order”), Plaintiff Singular Computing LLC does not oppose the relief requested herein.

The Cross-Use Order applies the terms of the Protective Order in *Singular I* to the use of Protected Materials produced or provided in *Singular I* in the above-captioned case. The Protective Order allows a party producing documents in discovery to designate documents as “Confidential” after making a good-faith determination that the documents contain information that is “confidential, proprietary, and/or commercially sensitive information.” Protective Order ¶¶ 6-7. The Protective Order requires that a party intending to make court filings referring to “Confidential” information bring a motion to impound. *Id.* ¶ 14.

Google’s Answer contains references to materials and information that Singular and third parties maintain are confidential under the Protective Order. Submission of such information is necessary to provide the rationale for Google’s responses and affirmative defenses to Singular’s

Amended Complaint. Google therefore moves to seal those portions of its Answer that quote from or discuss such confidential information. A redacted, public version of Google's Answer is being filed concurrently.

For the foregoing reasons, Google respectfully requests that the Court permit it to redact the portions of Google's Answer that quote from or discuss information that Singular or a third party has designated as confidential. Google further requests that the documents remain sealed until further order by the Court, and that upon expiration of the impoundment that the documents be returned to Google's counsel.

Respectfully submitted,

Dated: April 11, 2022

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CERTIFICATE PURSUANT TO LOCAL RULE 7.2

The undersigned hereby certifies that counsel for Google conferred with counsel for Singular Computing LLC in a good-faith attempt to resolve or narrow the issue raised by this motion. Singular's counsel indicated that Singular does not oppose the relief requested by this Motion.

Dated: April 11, 2022

/s/ Nathan R. Speed
Nathan R. Speed

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

Dated: April 11, 2022

/s/ Nathan R. Speed
Nathan R. Speed